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Attorney for Defendant
JONATHAN SOUVANNASANE

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA
Plaintiff,

v.

JONATHAN SOUVANNASANE
Defendant.

**Case: 1:23-CR-00042 JLT-SKO
1:15-CR-00167 JLT SKO**

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS
UNDER SPEEDY TRIAL ACT;
ORDER**

DATE: November 27, 2023
TIME: 10:00 am
COURT: Hon. Jennifer L. Thurston

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This matter is currently set for sentencing on November 27, 2023 in this Court.
2. By this stipulation, defendant now moves to continue the sentencing until **January 29, 2024**, and to exclude time between **November 27, 2023**, and **January 29, 2024**.
3. The parties agree and stipulate, and request that the Court find the

following:

- a) Counsel for defendant desires additional time to discuss sentencing issues in this matter and the application of various enhancements to the sentencing.
- b) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
- c) The government does not object to the continuance.

IT IS SO STIPULATED.

Dated: November 20, 2023

PHILLIP A. TALBERT
United States Attorney
/S/ KIMBERLY SANCHEZ
KIMBERLY SANCHEZ
Assistant United States Attorney

Dated: November 20, 2023

/s/ YAN SHRAYBERMAN
YAN SHRAYBERMAN
Counsel for Defendant

FINDINGS AND ORDER

IT IS SO FOUND.

IT IS SO ORDERED.

Dated: November 21, 2023


UNITED STATES DISTRICT JUDGE